

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

**UNITED STATES OF AMERICA, *ex rel.*  
DILBAGH SINGH, M.D.,  
PAUL KIRSCH, M.D.,  
V. RAO NADELLA, M.D., and  
MARTIN JACOBS, M.D.,**

## Relators,

**V.**

**Civil Action No. 04-186E**

**BRADFORD REGIONAL  
MEDICAL CENTER,  
V & S MEDICAL ASSOCIATES, LLC,  
PETER VACCARO, M.D.,  
KAMRAN SALEH, M.D.,  
and DOES I through XX,**

## Defendants.

## JOINT MOTION TO AMEND CASE MANAGEMENT ORDER

The Relators and Defendants, by and through their undersigned attorneys, move this Court pursuant to Fed.R.Civ.P 16(b) to amend its Case Management Order in the above action dated November 30, 2006 (Docket Number 44). The parties have exchanged written discovery and documents. The reason for this motion is that there are discovery disputes presently pending before the Court, including Motions to Compel Production of Documents from Relators and from Tri-County Diagnostic Testing Services, LLC, as well as other scheduling issues. This motion is not made for the purpose of delay. The proposed amendments are as follows:

5. The parties shall complete fact discovery ninety (90) days after the Court's ruling on the Motion to Compel Production of Documents by Relators filed by BRMC on May 10, 2007. All interrogatories, depositions, requests for admissions and requests for production shall be served with sufficient time to allow responses to be completed prior to the close of discovery.
6. Relators' expert report(s) are due no later than 30 days after the date set for the close of fact discovery set by Paragraph 5 above. Defendants' expert reports are due no later than 60 days after the date set for the close of fact discovery set by Paragraph 5 above. Depositions of experts shall be completed no later than 90 days after the date set for the close of fact discovery set by Paragraph 5 above.

A proposed order is attached.

Respectfully submitted, this 14th day of May 2007.

/s/ Carl J. Rychcik

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Attorneys for Relators

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the attached document was served on each of the following attorneys via the Court's electronic case filing system and First Class United States mail on the date set forth below:

**Via electronic filing and U.S. mail:**

Paul Skirtich, Esquire  
United States Attorney's Office  
Civil Division  
USPO & Courthouse  
Pittsburgh, PA 15219

**Via U.S. mail only:**

Michael Granston, Esquire  
U.S. Department of Justice  
Commercial Litigation Branch  
P.O. Box 261  
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/s/ Daniel M. Mulholland III

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